



Order Filed on January 12, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

**Robertson, Anschutz, Schneid, Crane & Partners
PLLC**

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Attorneys for Secured Creditor

Harold Kaplan (HK 0226)

In Re:

LORI KIM ANDREWS JONES,

Debtor.

Case No.: 21-16020

Chapter: 13


Hearing Date: 01/18/2022

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: January 12, 2022


Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: JPMorgan Chase Bank, N.A.

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners PLLC

Debtors' Counsel: Law Offices of Andrew B. Finberg, LLC

Property Involved ("Collateral"): 2019 Land Rover Range Rover Sport (VIN: SALWV2SV9KA847993)

Relief sought: ☒ Motion for relief from the automatic stay
☐ Motion to dismiss
☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:
 - The Debtor is overdue for 2 months from December 13, 2021 through January 13, 2022 at \$1,402.27 per month.
Funds Held In Suspense 0.00
Total Arrearages Due \$2,804.54.
2. Debtor must cure all post-petition arrearages, as follows:
 - Beginning on February 13, 2022, regular monthly payments shall continue to be made in the amount of \$1,402.27.
 - Beginning on February 13, 2022, monthly cure payments shall be made in the amount of \$467.42 for 5 months. A 6th and final cure payment shall be made in the amount of \$467.44 on, or before, July 13, 2022.
3. Payments to the Secured Creditor shall be made to the following address(es):
 - Regular monthly payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department

P.O. Box 901032
Ft. Worth, Texas 76101-2032

■ Monthly cure payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

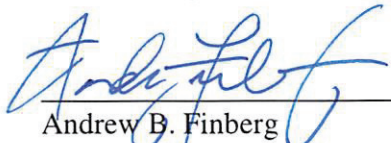
The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Andrew B. Finberg
Attorney for Debtor(s)
Date: 1/12/2022

/s/Harold Kaplan

Harold Kaplan
Attorney for Secured Creditor
Date: 1/12/2022